UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

GREAT LAKES ACQUISITION CORP.,

Case No. 21-cv-10143

Plaintiff,

Hon. Robert H. Cleland

v.

Magistrate Judge Elizabeth A. Stafford

NATASHA (OGINSKY) SANDERS,

Defendant.

Plaintiff's Response to Court's June 3, 2021 Show-Cause Order

This case alleges that Plaintiff Sanders breached her own contract, and tortiously interfered with the contract of her former co-worker Joseph Mooney. *See* ECF No. 1, PageID.6-11. As the Complaint indicated, Plaintiff was involved in related litigation in another court against Mr. Mooney. *Id.* at PageID.22, ¶ 22. The parties in the *Mooney* litigation have reached a resolution and are finalizing the terms of an agreement that will resolve the claims related to Defendant Sanders that are at issue in this case. In light of this tentative agreement, Defendants have not yet filed a motion for entry of default judgment in this case.

Plaintiff anticipates that the *Mooney* matter will be resolved this month, and that it will file a stipulation of dismissal with prejudice in this case. In the unlikely

event that the *Mooney* agreement is not finalized and executed, Plaintiff will move forward with this matter, including seeking default judgment.

Plaintiff has not failed to prosecute the case, but rather is attempting to resolve the dispute without Court intervention. For these reasons, Plaintiff requests that the Court vacate the show-cause order and permit the parties until August 1, 2021 to work out an agreement.

Date: June 15, 2021 /s/ Thomas J. Davis

Thomas J. Davis (P78626) Kienbaum Hardy Viviano Pelton & Forrest, P.L.C. Attorneys for Plaintiff 280 N. Old Woodward Ave., Ste. 400 Birmingham, MI 48009 (248) 645-0000 tdavis@khypf.com

CERTIFICATE OF SERVICE

I hereby certify that on June 15, 2021, I electronically filed the foregoing document with the Clerk of the Court using the ECF system, and I hereby certify that I have served the document by USPS Priority Mail with tracking to the following non-ECF participant:

Natasha (Oginsky) Sanders 2451 Midtown Ave., Apt. 1608 Alexandria, VA 22303-1439

/s/Thomas J. Davis

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